

GEF:hh
4/30/19

IN THE BANKRUPTCY COURT OF THE UNITED STATES
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF:

CHAPTER 11 BANKRUPTCY

WESTERN RESERVE WATER
SYSTEMS, INC.

CASE NO. 19-11864

Debtor

JUDGE JESSICA PRICE SMITH

**APPLICATION FOR ORDER APPROVING
EMPLOYMENT OF CONSULTANT**

The Applicant represents as follows:

1. On April 1, 2019, the Applicant filed a Voluntary Petition for Relief Under Chapter 11 of the Bankruptcy Code, and is now operating its business as a Debtor in Possession.

2. The Applicant, as the Debtor in Possession, has not engaged a Consultant in this case and wishes to engage DAVID GOUTTIERE, and the consulting firm of FocusCFO of 1010 Jackson Hole Drive, Suite 202, Blacklick, OH 43004, as the Consultant for the Debtor in Possession in this Chapter 11 case.

3. The Applicant proposes to employ the above-named Consultant and the consulting firm for the following purposes:

A. To advise the Applicant with respect to financial management and consulting matters;

B. To assist in the development of internal management and organization;

C. To assist in the preparation of internal budgets and forecasts;

D. To offer advice and consultation with respect to strategic planning.

4. The Applicant has made careful and diligent inquiry and is satisfied that the above-named Consultant and consulting firm are qualified and competent to assist the Applicant as a Debtor in Possession in the case for the following reasons:

A. The Consultant has assisted the Applicant previously and is acquainted with the Applicant's business operation and financial affairs;

B. The Consultant is experienced in assisting businesses of similar size and complexity to that of the debtor.

5. The Applicant has entered into a written Agreement with the above-named Consultant and consulting firm dated April 22, 2019, with respect to the services to be performed by the said Consultant and the compensation to be paid to the Consultant for such services and prepetition consulting services have been provided to debtor. A copy of the Agreement is attached to this application and the Applicant proposes to compensate the Consultant at the rate set forth in the agreement, subject to the approval of the Court after the rendering of such services.

6. The Applicant is informed and believes that the above-named Consultant and consulting firm have no connection with the debtor, creditors, or any other party in interest, or their respective attorneys or Consultants, except that the said Consultant has assisted the debtor previously, DAVID GOUTTIERE, is acquainted with the debtor's management, and is familiar with the debtor's business operation and financial affairs. The Applicant is informed and believes that the above-named Consultant and consulting firm does not hold or represent an interest adverse to the estate with respect to the matters on which they are employed, and that the employment of the above-named Consultant and consulting firm is in the best interest of the estate.

7. Applicant asks that Consultant be appointed as of the Petition date because Consultant has been performing services for the debtor, because of the complexity of the case, because of the health of the attorney for the debtor and because recent conversations with United States Trustee resulted in this application being filed.

WHEREFORE, the Applicant respectfully requests this Honorable Court to enter an Order approving the employment of DAVID GOUTTIERE, and the consulting firm of FocusCFO of 1010 Jackson Hole Drive, Suite 202, Blacklick, OH 43004 as Consultants for the Debtor in Possession in this case.

Dated: 4/30/19

WESTERN RESERVE WATER SYSTEMS
Debtor(s)

By: /s/ Michael Eiermann

NOTICE

Pursuant to Local Bankruptcy Rule 9013-1, any objection to this Application must be filed within 14 days from the date of service as set forth on the certificate of service. If no response or objection is timely filed, the Court is authorized to grant the relief requested without further notice.

Respectfully submitted,

/s/ Glenn E. Forbes
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CERTIFICATE OF TRANSMITTAL BY MAIL

The undersigned certifies under penalty of perjury that he or she has, on May 7, 2019, by e-mail, addressed to the entity's address of record, transmitted a true copy of this Application For Order Approving Appointment of Consultant and a Verified Statement to the United States Trustee, and all interested parties via the Court's electronic mail system, and to all creditors via regular US Mail, postage pre-paid.

US Trustee at Registereduser@usdoj.gov

Amy L. Good, US Trustee's Office, Amy.L.Good@UST.DOJ.GOV

Michael P. Shuster for of Creditor KeyBank National Association mshuster@porterwright.com

Western Reserve Water Systems, Inc
4133 East 49th Street
Cleveland, OH 44105

20 Largest Unsecured Creditors:

AETNA PLASTICS CORP.
P.O. BOX 931780
Cleveland, OH 44193

BENOVIATION
2035 READING RD.
Cincinnati, OH 45202

BONDED CHEMICALS
1125 SOLUTIONS CENTER
Chicago, IL 60677

CHEMTREAT, INC
15045 COLLECTIONS CENTER
Chicago, IL 60693

ENPRESS, LLC
34899 CURTIS BLVD
Eastlake, OH 44095

ENVIROSERVE
PO BOX 413070
Salt Lake City, UT 84141

FILMTEC CORPORATION
4118 COLLECTION CENTER DR
Chicago, IL 60693

GCS WATER PURIFICATION, LLC
PO BOX 703
Rosharon, TX 77583

KELLY SERVICES, INC.
PO BOX 820405
Philadelphia, PA 19182

Key Bank
127 Public Square
Cleveland, OH 44114

METTLER-TOLEDO INGOLD
23669 NETWORK PLACE
Chicago, IL 60673

NEORS
PO BOX 94550
Cleveland, OH 44101

OTP INDUSTRIAL SOLUTIONS
PO BOX 73278
Cleveland, OH 44193

PUROLITE COMPANY
PO BOX 824075
Philadelphia, PA 19182

RESINTECH
1 RESINTECH PLAZA
160 COOPER ROAD
West Berlin, NJ 08091

REXEL OF AMERICA, LLC
PO BOX 742833
Atlanta, GA 30374-2833

SUEZ WTS USA, INC
12822 COLLECTION CENTER
DRIVE
Chicago, IL 60693

TALENT TRANSPORTATION, INC.
PO BOX 361159
Strongsville, OH 44136

WATER SURPLUS
PO BOX 2668
Loves Park, IL 61132

WSM
580 GOLDEN OAK PARKWAY
Oakwood Village, OH 44146

/s/ Glenn E. Forbes, Esq.

Glenn E. Forbes, Esq.

FORBES LAW LLC

Attorney for Debtor